

## **REMARKS**

Applicants respectfully request consideration of the subject application as amended herein. This Amendment is submitted in response to the Final Office mailed on June 2, 2009. Claims 71-91 are rejected. In this Amendment, new claim 92 has been added. Claims 71, 76, 78, 83, 85 and 90 have been amended. Therefore, claims 71-92 are presented for examination.

### **Claim Rejections**

Claims 71-91 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Nagamoto et al. (U.S. Patent No. 6334126, hereinafter “Nagamoto”) in view of Schuetze et al. (U.S. Patent No. 6101320, hereinafter “Schuetze”), and further in view of Tso et al. (U.S. Patent No. 6421733, hereinafter “Tso”).

Nagamoto teaches a server that can convert image data from one format to another. (Nagamoto, col. 6, lines 3-8). In Nagamoto, the server receives a request for data from a client that includes information identifying capabilities of the client. (Nagamoto, col. 10, lines 30-34). The server then converts the data from one image format to another image format based on the identified capabilities. (Nagamoto, col. 11, lines 9-17). However, though Nagamoto teaches converting an image from one format to another, Nagamoto fails to teach how this is accomplished. (see, e.g., Nagamoto, col. 11, lines 9-16).

Schuetze teaches converting email and any email attachments (e.g., attached images) from a first email type to a standard intermediate format, and from the standard intermediate format to a second email type. (Schuetze, col. 2, lines 10-27). However, the standard intermediate format of Schuetze is an ASCII or MIME encoded email format. (see, e.g.,

Schuetze, col. 2, lines 10-27; col. 8, lines 6-15). Schuetze does not teach or suggest any color space transformations.

Tso teaches a system for dynamically transcoding data transmitted between computers. Such transcoding can include compressing or decompressing image data. (Tso, col. 12, lines 55-67). However, Tso does not teach that the image data is decompressed to generate a bitmap. Nor does Tso teach converting a decompressed bitmap image to a standard intermediate format, or mapping the standard intermediate format to a selected image format.

Claim 71 has been amended to recite:

... generating said version of the digital photographic image by decompressing the digital photographic image to generate a bitmap in a first color space that was used to generate the digital photographic image, converting the bitmap of the digital photographic image from the first color space to a standard intermediate color space, and mapping the bitmap from the standard intermediate color space to the selected image format, wherein the mapping includes converting the bitmap to a third color space ...

As noted above, Nagamoto specifically fails to teach or suggest decompressing an image to generate a bitmap in a first color space that was used to generate the image, converting the bitmap to a standard intermediate color space, or mapping the bitmap from the standard intermediate color space to third color space, as recited in claim 71. Therefore, Nagamoto fails to teach or suggest all of the limitations of claim 71.

As noted above Schuetze does not teach or suggest decompressing an image to generate a bitmap in a first color space that was used to generate the image, converting the bitmap to a standard intermediate color space, or mapping the bitmap from the standard intermediate color space to third color space. Accordingly, Schuetze fails to teach or suggest the limitations of claim 71 that are missing from Nagamoto.

Tso does not teach or suggest decompressing an image to generate a bitmap in the first color space, converting the bitmap to an intermediate color space, nor mapping the bitmap to a third color space. Therefore Tso fails to teach or suggest the features of claim 71 that are missing from Nagamoto and Schuetze.

Therefore, the combination of Nagamoto, Schuetze and Tso fails to teach or suggest all of the limitations of claim 71 or its dependent claims. Accordingly, applicants respectfully request that the rejection to claim 71 and its dependent claims under 35 U.S.C. 103(a) be withdrawn.

Claim 78 as amended includes the language,

... decompressing the digital photographic image to generate a bitmap in a first color space that was used to generate the digital photographic image, converting the bitmap of the digital photographic image from the first color space to a standard intermediate color space, and mapping the bitmap from the standard intermediate color space to the selected image format, wherein the mapping includes converting the bitmap to a third color space ...

As discussed above, the combination of Nagamoto, Schuetze and Tso fail to teach or suggest converting the bitmap of the digital photographic image from the first color space to a standard intermediate color space, and mapping the bitmap from the standard intermediate color space to a third color space. Accordingly, applicants respectfully request that the rejection to claim 78, and its corresponding dependent claims, under 35 U.S.C. 103(a) also be withdrawn.

Claim 85 includes the language,

... a photo translator to generate said version of the digital photographic image by decompressing the digital photographic image to generate a bitmap in a first color space that was used to generate the digital photographic image, to convert the bitmap of the digital photographic image from the first color space to a standard intermediate color space, and to map the bitmap from the standard intermediate color space to the selected image format if the version of the digital photographic image having the selected

image format is not stored at the server, wherein the mapping includes converting the bitmap to a third color space ...

As discussed above, the combination of Nagamoto, Schuetze and Tso fail to teach or suggest a photo translator that generates a bitmap in the first color space, converts to an intermediate color space, and maps to a third color space. Accordingly, applicants respectfully request that the rejection to claims 85, and its corresponding dependent claims, under 35 U.S.C. 103(a) also be withdrawn.

**Conclusion**

Applicants respectfully request the withdrawal of the rejections and submit that pending claims 71-92 are in condition for allowance. Applicants respectfully request reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Benjamin Kimes at (408) 720-8300.

**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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